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and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

**PG&E CORPORATION,**

**- and -**

**PACIFIC GAS AND ELECTRIC COMPANY,**

**Debtors.**

- ☐ Affects PG&E Corporation  
☒ Affects Pacific Gas and Electric Company  
☐ Affects both Debtors

*\* All papers shall be filed in the Lead Case,  
No. 19-30088 (DM).*

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Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case) (Jointly Administered)

**REQUEST FOR JUDICIAL NOTICE  
IN SUPPORT OF DEBTORS'  
PRELIMINARY LIMITED  
OPPOSITION TO VLAZAKIS  
DEFENDANTS' MOTION AS TO  
THE INAPPLICABILITY OF STAY,  
AND IN THE ALTERNATIVE FOR  
RELIEF FROM STAY**

Relates to Dkt. Nos. 4846, 4847

Date: December 17, 2019  
Time: 10:00 a.m.  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

1                   **TO THE COURT AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2                   Pacific Gas and Electric Company (the “**Utility**”), as a debtor and debtor in possession along  
3 with PG&E Corporation (“**PG&E Corp.**”, together with the Utility, the “**Debtors**”) in the above-  
4 captioned Chapter 11 Cases (the “**Chapter 11 Cases**”) hereby respectfully requests that the Court  
5 take judicial notice pursuant to Federal Rule of Evidence 201 of the following documents filed in  
6 in the Superior Court for the County of Alameda, *PG&E v. Vlazakis et al.*, Case No. RG19021463  
7 (the “**State Court Action**”):

8                   1.       The Declaration of Brian Garber in Support of Pacific Gas and Electric Company’s  
9 Application for Preliminary Injunction, filed on June 6, 2019, a true and correct copy of which is  
10 attached hereto as **Exhibit A**.

11                   3.       The Supplemental Declaration of Brian Garber in Support of Pacific Gas and Electric  
12 Company’s Application for Preliminary Injunction, filed on July 11, 2019, a true and correct copy  
13 of which is attached hereto as **Exhibit B**.

14                   It is appropriate for the Court to take judicial notice of Exhibits A and B. Under Federal  
15 Rule of Evidence 201, upon the request of a party, a court may take judicial notice of a fact that  
16 “can be accurately and readily determined from sources whose accuracy cannot reasonably be  
17 questioned.” Fed. R. Evid. 201(b)(2). The authenticity of Exhibits A and B cannot reasonably be  
18 questioned because they are publicly available filings in the State Court Action.

19                   Accordingly, the Debtors respectfully request that the Court take judicial notice of the  
20 documents identified above and attached hereto as Exhibits A and B.

21                   Dated: December 12, 2019

**WEIL, GOTSHAL & MANGES LLP**

**KELLER & BENVNUTTI LLP**

23                   By:     /s/ Peter J. Benvenutti  
24                                   Peter J. Benvenutti

25                                   *Attorneys for Debtors and Debtors in Possession*